UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

| In re: |) Chapter 11 |
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| VOYAGER DIGITAL HOLDINGS, INC., et al.,1 |) Case No. 23-cv-2171) 22-bk-10943 (MEW) |
| Debtors. |) (Jointly Administered) |
| | ON APPEAL FROM THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF NEW YORK |

DECLARATION OF AARON L. NIELSON IN SUPPORT OF MOTION FOR ADMISSION TO APPEAR PRO HAC VICE

I, Aaron L. Nielson, pursuant to 28 U.S.C. § 1746, hereby declare as follows: 1.

I am of counsel with the law firm of Kirkland & Ellis LLP, and I submit this

Declaration in Support of my application for admission pro hac vice to this Court for all purposes in connection with this action.

- 2. As shown in the Certificates of Good standing annexed hereto as Exhibit A, I ama member in good standing of the bars of the States of the District of Columbia and Utah.
 - 3. I have never been convicted of a felony.
- 4. I have never been held in contempt by any court, nor have I been censured, suspended, disbarred or denied admission or readmission by any court.

The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The location of the Debtors' principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003.

- 5. I am not the subject of any present or past disciplinary proceedings in this or any other court.
- 6. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted,

April 12, 2023 New York, New York /s/ Aaron L. Nielson

KIRKLAND & ELLIS LLP

Aaron L. Nielson (pro hac vice pending)

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